

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
14-CR-389 (MJD/BRT)**

UNITED STATES OF AMERICA,
Plaintiff,

**DEFENDANT'S POSITION
REGARDING SENTENCING**

v.

MOHAMED ALI OMAR,
Defendant.

INTRODUCTION

Mr. Omar, through his lawyer, Paul Applebaum, submits this position paper in anticipation of sentencing in this matter.

DISCUSSION

Defendant makes no additions or corrections to the PSI.

In all of my years as a criminal defense lawyer, Mr. Omar is one of the finest, most upright young citizens I have had the pleasure of representing. He is smart, young, funny, charismatic, handsome, well-spoken, has a strong sense of right and wrong, and puts his family first. I have no doubt that he will overcome this prosecution and blossom into a positive leader in Minnesota's growing Somali community over the coming decades. By contrast, the less said about the agents' conduct in this matter, the better.

CONCLUSION

Mr. Omar requests that he be sentenced to probation.

Dated: June 8, 2015

Respectfully submitted,

s/ Paul Applebaum

Paul Applebaum (223098)
First National Bank Building
332 Minnesota Street, Suite W-1610
St. Paul, Minnesota 55101
(dir) (651) 222-2999
(fax) (651) 223-5179
Attorney for Defendant